



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**JUL 20 2010**

Ref: 8EPR-N

Andrea M. Jones, Acting District Ranger  
Conejos Peak Ranger District  
Rio Grande National Forest  
15571 County Road T.5  
La Jara, CO 81140

RE: EPA Comments on Final Environmental  
Impact Statement, North San Juan Sheep and Goat  
Allotments, CEQ #20100244

Dear Ms. Jones:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the June 2010 Final Environmental Impact Statement (FEIS) for the North San Juan Sheep and Goat Allotments. This FEIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Rio Grande National Forest to assess and disclose potential environmental impacts associated with continued livestock grazing on 12 existing sheep and goat allotments within the Conejos Peak Ranger District. The USFS administers the approximately 47,589 acres of the analysis area, which is located in the Colorado counties of Conejos, Rio Grande, and Archuleta, about 38 miles west of the community of La Jara. Four of the 12 allotments are located partially or fully in the South San Juan Wilderness Area, accounting for 31 percent of the project area. Existing livestock grazing activities have been conducted for years per the guidelines established under the 1964 Wilderness Act.

EPA provided comments on the Draft Environmental Impact Statement (DEIS) with an August 20, 2009 letter. As described in the DEIS, the preferred Alternative 3 will continue to permit livestock grazing within the North San Juan Sheep and Goat Allotments under an adaptive management strategy that will meet or move toward desired conditions. Among other things, the proposed action is designed to provide adaptive management flexibility, reduce potential wildlife conflicts, and continue improving resource trends where needed and maintaining resource conditions that are currently satisfactory. EPA expressed support for the Ranger District's direction to improve and protect the forest resources and provided recommendations for the proposed adaptive management and monitoring program.

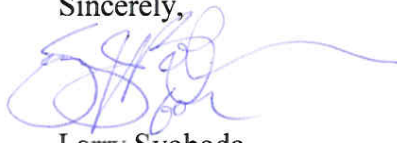
The FEIS includes revisions made by the USFS in response to comments received on the DEIS. The USFS has also issued a Record of Decision (ROD) for the project. Specifically, the USFS has decided to implement Alternative 3, Adaptive Livestock Grazing Management.

Based on our review of the FEIS, EPA is satisfied that most of its recommendations for adaptive management have been adequately addressed. Specifically, the inclusion of an additional monitoring requirement for the interdisciplinary team to discuss the adaptive management feedback loop at least every three years should provide the opportunity to assess whether thresholds are being met and any need for specific actions if thresholds are not being met. In addition, the interdisciplinary team will be able to use the three year reviews to assess whether more detailed and frequent monitoring is necessary for such rangeland measures as riparian streambank stability/alteration, riparian forage utilization, and upland forage utilization. Therefore, EPA believes the FEIS supports the decision to implement Alternative 3, Adaptive Livestock Grazing Management.

However, please note that we continue to recommend establishment of a water quality monitoring plan to document existing conditions and to track effectiveness of the management practices. Given the high resource values of the area, including threatened/endangered/sensitive species and other wildlife, as well as rivers and creeks of national importance for sport fisheries or eligible for designation as "wild" or "scenic," we believe a water quality monitoring plan would be a beneficial tool in efforts to achieve and/or maintain desired forest conditions.

We appreciate the opportunity to review this FEIS. If we may provide further explanation of our comments, please contact me at 303-312-6004, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Larry Svoboda  
Director, NEPA Program  
Ecosystems Protection and Remediation